

REMARKS

Applicants hereby confirm the previous election to prosecute the invention of group 1, species of fig. 2, claims 1-17. Claims 1-17 of the application are cancelled herein and new claims 22-38 added. All of the new claims read on the elected species of Fig. 2. None of the new claims are generic to both species.

35 U.S.C. §112, second paragraph

Claims 5 and 9-17 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The rejected claims have been cancelled herein and the newly submitted claims 22-38 do not include the lack of antecedent basis and language deemed ambiguous/in statutory non-compliance by the Examiner. No new matter has been added in the newly submitted claims 22-38.

35 U.S.C. § 102

Claim 17 has been rejected under 35 U.S.C. § 102(b/e) as being anticipated by Takagi (US 2002/0153083) or Caretta, et al. (US 6,908,523) (hereinafter "Caretta"). This rejection is rendered moot in light of the cancellation of claim 17 herein. Applicants submit that newly submitted claims 22-38 are allowable over the Takagi and Caretta references, whether such references be considered individually or in combination.

Figure 21 of Takagi discloses a module that includes workstations 101, 102, 103 positioned along a U-shaped path 11. Figure 1 of Takagi also discloses a module that includes workstations 101, 102, 103 positioned along a linear path 11. The drums are presented to peripheral workstation 101, then to peripheral workstation 102, then to the central workstation 103, and finally to the central cure station 104. Path 11 can include a fixed track with carriages (see para. 113).

However, in distinction with the new independent claim 22, Takagi emphasizes that the workstations 101, 102, 103 are disposed on only one side of path 11. See Abstract; para. 37; para. 104. Consequently, Takagi fails to disclose that "at least one of said first workstations disposed an opposite side of said path from at least another of said first workstations."

Caretta et al. has a similar deficiency. Caretta et al. discloses a closed loop circular path 11 and workstations 6, 7, 8, 9, and 10 that are disposed radially outside of the circular path 11. Consequently, Caretta et al. fails to disclose that "at least one of said first workstations disposed an opposite side of said path from at least another of said first workstations." The secondary references cited by the Examiner do not cure this deficiency of Caretta et al.

As Takagi or Caretta et al. fail to anticipate the invention as recited in newly submitted claims 22-38, it is respectfully requested that this rejection be withdrawn.

35 U.S.C. § 103

Claims 1-5, 7-13, 15 and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Caretta taken in view of at least one of Black, et al. (US 3,389,032) (hereinafter "Black"), Maas (US 1,818,955) and Harsel (US 1,552,987). The rejected claims have been cancelled herein. This rejection is respectfully traversed in regard to currently pending claims 22-38 for at least the reasons set forth above and for the following additional reasons. Applicants submit that Takagi specifically teaches away from placing workstations on both sides of the path 11. Caretta et al. also fails to provide any suggestion to modify the closed loop path 11 to permit workstations to be placed inside the path 11. The Black, Maas, and Harsel references have a similar deficiency in that none teach or suggest workstations on both sides of a path as required in claims 22-38. Further, no modification is suggested in any of the cited art that would instruct one skilled in the art toward the claimed invention.

As Caretta in view of Black, Maas and Harsel fails to establish *prima facie* obviousness of the invention as recited in claims 1-5, 7-13, 15 and 16, it is respectfully requested that the rejection be withdrawn.

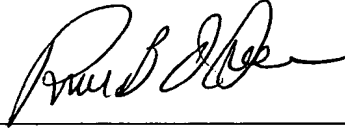
Claims 6 and 14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Caretta taken in view of at least one of Black, Maas and Harsel and further in view of at least one of Mitamura, et al. (US 2002/0015746) (hereinafter Mitamura), Sumner, et al. (US 4,699,578) (hereinafter "Sumner") and Northrup (US 1,566,500). Claims 6 and 14 are cancelled herein. This rejection is respectfully traversed in regard to currently pending claims 22-38 for the reasons set forth previously and for the following reasons. Neither Mitamura, Sumner, nor Northrup cure the deficiencies in the primary cited art. No reference teaches or suggests workstations on both sides of a path as required in claims 22-38. Further,

no modification is suggested in any of the cited art that would instruct one skilled in the art toward the claimed invention.

As Caretta et al. taken in view of at least one of Black, Maas and Harsel and further in view of at least one of Mitamura, Sumner, and Northrup fail to establish *prima facie* obviousness of the invention as recited in claims 6 and 14, it is respectfully requested that the rejection be withdrawn.

In light of this amendment, all of the claims now pending in the subject patent application are deemed allowable. Thus, the Examiner is respectfully requested to allow all pending claims.

Respectfully submitted,



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